

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

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ELLIOTT BROIDY and BROIDY CAPITAL
MANAGEMENT, LLC,

Plaintiffs,

- against -

GLOBAL RISK ADVISORS LLC,
GRA MAVEN LLC,
GRA QUANTUM LLC,
GLOBAL RISK ADVISORS EMEA LIMITED,
GRA RESEARCH LLC,
QRYPT, INC.,
KEVIN CHALKER,
DENIS MANDICH,
ANTONIO GARCIA, and
COURTNEY CHALKER,

Defendants.
-----X

Case No. 19-cv-11861-MKV

Oral Argument Requested

**NOTICE OF DEFENDANTS' MOTION TO DISMISS
PLAINTIFFS' SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Paul J. Kremer, dated May 3, 2022 and the Exhibit annexed thereto; the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Second Amended Complaint, dated May 3, 2022; and all prior pleadings, papers, and proceedings herein, Defendants Global Risk Advisors LLC, GRA Maven LLC, GRA Quantum LLC, Global Risk Advisors EMEA Limited, GRA Research LLC, Qrypt Inc., Kevin Chalker, Denis Mandich, Antonio Garcia, and Courtney Chalker (together, "Defendants") will move, by the undersigned counsel, before the Honorable Mary Kay Vyskocil, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 18C, New York, New York 10007, on such date and time to be set by the Court,

for an order dismissing all claims against them with prejudice under Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request oral argument in connection with this motion to dismiss, and will file a letter to that effect pursuant to Section 4.A.vii. of Judge Vyskocil's Individual Rules of Practice in Civil Cases.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Court's April 5, 2022 Order, ECF Doc. No. 122, Plaintiffs' opposition papers are to be filed and served on or before May 31, 2022, and Defendants' reply papers are to be filed and served on or before June 14, 2022.

Dated: May 3, 2022
New York, New York

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Orin Snyder

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